

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FOCAL POINT, LLC,

Plaintiff,

v.

KENNETH CZECH,

Defendant.

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Case No. 1:19-CV-5115

**JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Kenneth Czech ("Defendant") and Plaintiff Focal Point, LLC ("Plaintiff"), by and through their counsel of record, respectfully jointly move the Court for an order extending Defendant's deadline to answer or otherwise respond to Plaintiff's Complaint as set forth below, and in support of this Joint Motion, state as follows:

1. Plaintiff's Complaint was served on Saturday, August 3, 2019, making Defendant's Answer or other response due by Monday, August 26, 2019.

2. On August 8, 2019, the Court scheduled the Initial Status Hearing in this matter to occur on October 9, 2019.

3. Defendant and Plaintiff (collectively the "Parties") are engaged in substantive efforts to try to resolve this matter including having agreed to a protocol for forensic computer analysis of certain devices, which will begin shortly, and subsequent mediation. The Parties further have agreed to jointly request that the Court extend the deadline for Defendant to respond to the Complaint to a date no less than twenty-one (21) days from the date, following mediation, that Focal Point gives notice of its intention to proceed with this litigation if such mediation efforts fail to resolve the matter.

4. Accordingly, in order to facilitate such resolution efforts and minimize expenditure of the Parties' and the Court's resources, the Parties hereby jointly ask this Court to order that Defendant's time to answer or otherwise respond to Plaintiff's Complaint be continued until further order of Court, but in any event no less than twenty-one (21) days from the date that Plaintiff gives notice of its intention to resume the litigation if mediation efforts fail to resolve the matter.

5. If the Parties have not resolved this matter by the time of the October 9, 2019 Initial Status Hearing, the Parties will so apprise the Court at that hearing, at which point the Parties anticipate that they will have either agreed on a date for Defendant to respond to the Complaint or will be prepared to request that the Court set such a date.

6. The Parties believe that this jointly requested extension will benefit efforts to informally resolve this matter.

7. No other extensions have been requested or granted.

WHEREFORE, the Parties respectfully jointly move the Court for an order providing that Defendant's deadline to answer or otherwise respond to the Complaint be extended generally until further order of this Court.

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that, on the 14th day of August 2019, I caused to be filed a copy of the foregoing Joint Motion For Extension Of Time For Defendant To Answer Or Otherwise Respond to Plaintiff's Complaint, using the Court's CM/ECF Electronic Case Filing system which will send notification to the following, in addition to service of the foregoing via email delivery:

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